

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN**

In re:

City of Detroit, Michigan

Debtor

Case No. 13-53846

Chapter 9

Hon. Steven W. Rhodes

**STIPULATION FOR ENTRY OF AN ORDER RESOLVING MOTION TO
EXTEND TIME FOR FILING PROOF OF CLAIM FILED BY
NATHANIEL BRENT**

The City of Detroit (the “City”) and Nathaniel Brent (“Brent”), stipulate and agree as follows:

WHEREAS, in February 2011, Brent commenced a lawsuit against, *inter alia*, the City of Detroit Police Department, two individual named City of Detroit police offices, and other John/Jane Doe officers, in the United States District Court for the Eastern District of Michigan, Case No. 11-10724, alleging that he is entitled to certain relief under 42 U.S.C. § 1983;

WHEREAS, on July 23, 2013, Brent filed a Notice of Appearance, Request for Service of Papers and Request to be Added as Creditor (“Notice of Appearance”) in the City’s bankruptcy case [Doc. No. 101];

WHEREAS, on November 21, 2013, this Court entered its Order, Pursuant to Sections 105, 501 and 503 of the Bankruptcy Code and Bankruptcy Rules 2002 and 3003(c), Establishing Bar Dates for Filing Proofs of Claim and Approving Form and Manner of Notice Thereof (“Bar Date Order”). [Doc. No. 1782]. The Bar

Date Order established 4:00 p.m., Eastern Time, on February 21, 2014 as the general bar date (“General Bar Date”). Bar Date Order ¶ 4;

WHEREAS, on December 24, 2013, this Court entered the Order, Pursuant to Sections 105 and 502 of the Bankruptcy Code, Approving Alternative Dispute Resolution Procedures to Promote the Liquidation of Certain Prepetition Claims (“ADR Order”) [Doc. No. 2302];

WHEREAS, paragraph 20 of the ADR Order provides that:

Notwithstanding anything in this Order, the “ADR Procedures” that this Order approves (Annex 1), or in the ADR Procedures Motion, all lawsuits alleging claims against the City, its employees or both under 42 U.S.C. § 1983 that are pending in the United States District Court are referred to Chief United States Judge Gerald Rosen for mediation under such procedures as he determines.

WHEREAS, on May 13, 2014, Brent filed the Motion to Extend Time for Filing Proof of Claim (“Motion”) [Doc. No. 4735];

WHEREAS, in the Motion, Brent alleges that he did not receive notice of the General Bar Date; and

WHEREAS, the City has examined its records and does not believe notice of the General Bar Date was served upon Brent in accordance with the Notice of Appearance.

NOW, THEREFORE, the City and Brent stipulate and agree:

1. Solely with respect to Brent, the General Bar Date established in the Bar Date Order shall be extended to permit Brent to file a proof of claim against

the City through and including 4:00 pm, Eastern Time, on June 16, 2014. All other terms and conditions set forth in the Bar Date Order shall continue to govern.

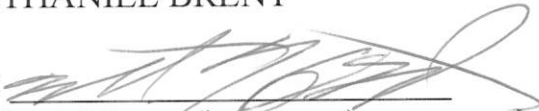
2. Any proof of claim filed by Brent on or before 4:00 pm, Eastern Time, on June 16, 2014, shall be referred to Chief United States Judge Gerald Rosen for mediation under such procedures as he determines pursuant to paragraph 20 of the ADR Order.

3. The parties request that the Court enter an Order in substantially the same form as the one attached as Exhibit A.

Agreed to:

Dated: May 21, 2014

NATHANIEL BRENT

By: 
Nathaniel Brent (in pro per)
538 South Livernois
Detroit, MI 48209
(313) 841-4591

Dated: May __, 2014

ATTORNEYS FOR THE CITY OF DETROIT

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EXHIBIT A

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN**

In re:

City of Detroit, Michigan

Debtor

Case No. 13-53846

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Hon. Steven W. Rhodes

/

**ORDER RESOLVING MOTION TO EXTEND TIME FOR FILING PROOF
OF CLAIM FILED BY NATHANIEL BRENT**

Upon the Stipulation, by and among, the City of Detroit (the “City”) and Nathaniel Brent (“Brent”), for Entry of an Order Resolving Motion to Extend Time for Filing Proof of Claim Filed by Nathaniel Brent; the Court having reviewed the Stipulation and determining that good and sufficient cause has been shown;

IT IS HEREBY ORDERED

1. The Motion¹ is resolved as set forth in this Order.
2. Solely with respect to Brent, the General Bar Date established in the Bar Date Order shall be extended to permit Brent to file a proof of claim against the City through and including 4:00 pm, Eastern Time, on June 16, 2014. All other terms and conditions set forth in the Bar Date Order shall continue to govern.
3. Any proof of claim filed by Brent on or before 4:00 pm, Eastern Time, on June 16, 2014, shall be referred to Chief United States Judge Gerald

¹ Capitalized terms not otherwise defined in this Order shall have the meanings ascribed to them in the Stipulation.

Rosen for mediation under such procedures as he determines pursuant to paragraph 20 of the ADR Order.